

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LMAR LAY, individually and for other  
similarly situated,

Plaintiff,

v.

BETACOM HOLDINGS INC., Washington  
for profit corporation; BETACOM  
INCORPORATED, a Florida for profit  
corporation,

Defendants.

Case No. 2:24-CV-01195-RSM

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO  
COMPLAINT AND ORDER**

**NOTE ON MOTION CALENDAR:  
SEPTEMBER 4, 2024**

WHEREAS, pursuant to Fed R. Civ. P. 6(b)(1)(A), Plaintiff LMar Lay and Defendants Betacom Holdings, Inc., and Betacom Incorporated stipulate to extend the time for Defendants to answer or otherwise respond to Plaintiff's Complaint until September 20, 2024. Counsel for Plaintiff and Defendants have conferred regarding this request. Good cause exists for this request because of the complex nature of the putative class action allegations in Plaintiff's Complaint.

By execution of this stipulation, Defendants do not waive any defenses. All parties preserve all of their respective rights and positions, and all sides agree that the execution of this stipulation shall not impact their respective rights and positions.

WHEREAS, Defendants have not requested previous extensions from this Court. A

STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT  
(2:24-CV-01195-RSM) - 1

**FOX ROTHSCHILD LLP**  
1001 FOURTH AVENUE, SUITE 4400  
SEATTLE, WA 98154  
206.624.3600

proposed order is submitted with this stipulation.

IT IS THEREFORE STIPULATED AND AGREED, by and between Plaintiff and Defendants, by and through their counsel and subject to approval of this Court.

DATED this 4<sup>th</sup> day of September 2024.

FOX ROTHSCHILD LLP

s/ James E. Breitenbucher

James E. Breitenbucher, WSBA #27670  
1001 Fourth Avenue, Suite 4400  
Seattle, WA 98154  
Tel 206.624.3600/Fax 206.389.1708  
Email: jbreitenbucher@foxrothschild.com

Nikki H. Howell\*  
Nicholas J. Walker\*  
FOX ROTHSCHILD LLP  
4900 Main Street, Suite 150  
Kansas City, MO 64112  
Tel 816.919.7900/Fax 816.919.7901  
Email: nhowell@foxrothschild.com  
nwalker@foxrothschild.com

*\*Pro Hac Vice Applications Forthcoming*

*Attorneys for Defendants Betacom Holdings Inc. and Betacom Incorporated*

**FRANK FREED SUBIT & THOMAS, LLP**

s/ Michael C. Subit

Michael C. Subit, WSBA #29189  
msubit@frankfreed.com  
705 Second Ave., Suite 1200  
Seattle, Washington 98104  
Telephone: 206.682.6711

**BRUCKNER BURCH, PLLC**

Richard J. (Rex) Burch\*  
rburch@brucknerburch.com  
11 Greenway Plaza, Suite 3025  
Houston, Texas 77046  
Telephone: 713.877.8788

**ANDERSON ALEXANDER, PLLC**

William C. (Clif) Alexander\*  
clif@a2xlaw.com  
Austin W. Anderson\*  
austin@a2xlaw.com  
101 N. Shoreline Blvd., Suite 610  
Corpus Christi, Texas 78401  
Telephone: 361.452.1279

*\*Pro Hac Vice Applications Forthcoming*

**JOSEPHSON DUNLAP, LLP**

Michael A. Josephson\*  
mjosephson@mybackwages.com  
Andrew W. Dunlap\*  
adunlap@mybackwages.com  
11 Greenway Plaza, Suite 3050  
Houston, Texas 77046  
Telephone: 713.352.1100

*Attorneys for Plaintiff LMar Lay*

**ORDER**

IT IS HEREBY ORDERED that the foregoing Stipulation for Extension of Time for Defendant Betacom Holdings, Inc. and Betacom Incorporated to respond to the Complaint is GRANTED.

DATED this 5<sup>th</sup> day of September, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE